

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Second Periodic Review of the)	MB Docket No. 03-15
Commission's Rules and Policies)	
Affecting the Conversion)	RM 9832
To Digital Television)	
)	
Children's Television Obligations of Digital)	MM Docket No. 00-167
Television Broadcasters)	

Reply Comments of Tim Collings

I am pleased to submit this reply in response to the FCC's Notice of Proposed Rule Making in the above-captioned proceedings. In particular, I would like to commend the Children's Media Policy Coalition (the "Coalition") for their thoughtful, and forward-looking assessment of the potential for digital television as it can and should answer the needs of children.

The digital revolution, while just beginning, provides the ability, as the Coalition so rightfully pointed out, to dramatically expand the environment for information, education, entertainment, and interactivity (the expanding landscape). Parents will want their children to participate in this expanding landscape. As the digital transition becomes a reality parents will, more than ever before, need appropriate tools to define the horizons in which their children can safely explore and grow. The parent is the one person most qualified to determine the child's changing ability to deal with the world being presented through this new and exciting media.

Digital television removes many of the constraints of the disappearing analog system and the V-Chip can provide flexibility, expandability and selectivity to address many of the concerns voiced by the Coalition.

As the Coalition has pointed out, an open, expandable V-Chip can recommend appropriate programming and can also help parents avoid programming they consider inappropriate for their child's level of understanding.

For example, an open V-Chip could allow for a positive rating system in the area of educational and informational television (E/I) programming. A simple E/I rating code, or a more comprehensive E/I rating system, could be introduced to label programs that meet certain educational or informational criteria for children. Since program listings can be downloaded to digital receivers, E/I programs could be flagged so that parents or educators could readily access this type of programming.

In answer to the Coalition's concerns about interactivity, an open expandable v-chip can become inclusive of any level of constraint to interactivity, not only in programming, but also in commercial content should that need be identified as the technology matures. We cannot know what applications future generations may develop for this emerging technology. If an open V-Chip is required and made available in consumer electronics, it will be able to expand to meet the innovations yet to be invented, and permit new and exciting features to enrich and protect young, inquisitive minds.

Given the Coalition's concern for children in this expanded digital landscape with improved picture and sound, the interactivity and wireless capability now on the horizon create a very real need to re-assess the kind and size of television applications children may have at their disposal. Content suitability becomes meaningless if parents can choose child appropriate programming in their living room, but not on the smaller-sized digital television in their child's room or the digital television the child may take to school. It would be appropriate to have all digital televisions equipped with V-Chip functionality, regardless of screen size.

CONCLUSION

I draw particular attention to a number of excellent recommendations from the Children's Media Policy Coalition, including:

- The Commission should require that digital television capabilities be used to help parents find programming that is beneficial for their children
- The Commission should adopt specific requirements to help parents learn about E/I programming and be able to find it more easily
- Technical standards for DTV should permit the V-Chip system to be improved upon, and should support multiple rating systems
- Parents should be provided with more information about the meaning of the ratings, the basis for a program's rating and how to use the V-Chip
- Policies need to be updated to address the new capabilities and the potential for unfair practices in advertising given digital television's ability to be interactive

I am pleased to report that all of these recommendations could be fulfilled using the proposed digital television framework as long as flexibility to modify the content advisory rating system is guaranteed in any standard that is adopted. Complete flexibility can be achieved by assigning a new Rating Region code for an extended US Rating Region Table (RRT). An extended RRT would allow organizations, such as educational groups, to rate programs and have their ratings transmitted in the PSIP data stream, along with other ratings.